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Rcv'd by:

USDC - GREENBELT
25 JUL 2 4:35 PM

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

SHERALL RANDALL

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Bozzuto Management
Company

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. 1:25CV2147

(to be filled in by the Clerk's Office)

Jury Trial:

☒ Yes ☐ No
(check one)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	SHERRALL RANDALL
Street Address	PO BOX 1269
City and County	Ellicott City Howard County
State and Zip Code	MD, 21041
Telephone Number	410-375-5151
E-mail Address	Sherrallrandall@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Bozzuto Management Company
Job or Title (if known)	
Street Address	6406 IVY LANE Suite 700
City and County	Greenbelt, Prince's George's County
State and Zip Code	Maryland, 20770
Telephone Number	410-840-7761
E-mail Address (if known)	

Defendant No. 2

Name _____
Job or Title _____
(if known) _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known) _____

Defendant No. 3

Name _____
Job or Title _____
(if known) _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known) _____

Defendant No. 4

Name _____
Job or Title _____
(if known) _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known) _____

(If there are more than four defendants, attach an additional page providing the same information for each additional defendant.)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

- ☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Fair Housing Act (42 U.S.C. ...), Americans with Disabilities Act, Rehabilitation Act Section 504, Civil Rights Conspiracy, Due Process

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Bozzuto Management Company, is incorporated under the laws of the State of (name) MARYLAND, and has its principal place of business in the State of (name) Maryland. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

The amount in controversy exceeds \$75,000 because
 plaintiff suffered ongoing disability discrimination, was denied a reasonable accommodation, and was forcibly evicted despite providing medical documentation. Defendant subjected Plaintiff to police involvement and falsely claimed she was legally banned from Bozzuto properties without providing notice or an opportunity to challenge the ban. Plaintiff and children were forced to live in a homeless shelter for 5 months. Causing further trauma and instability to the entire family while Plaintiff was actively participating in mental health treatment. Defendants actions significantly exacerbated her PTSD and mental health symptoms. Defendant failure to enforce their alleged legal ban on the guest, Ricardo Barbour who continue access to the property endangered Plaintiff PTSD and family. ~~Seeking~~ Plaintiff is seeking punitive damages for emotional distress, trauma, civil rights violations, long →

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term harm caused by being displaced, re-traumatized, and denied basic protections while actively receiving mental health treatment.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

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Plaintiff Sherrall Randall is a person with a diagnosed disability, PTSD, who lived at Azure Oxford Square Apts, owned and managed by Bozzuto Management Company. In 2023 Bozzuto claimed to have issued a legal ban against a known safety threat, Ricardo Barbour. Despite this Mr. Barbour continued access the building, where plaintiff resided. Plaintiff personally observed and video recorded Mr. Barbour on the premises, including on August 18, 2024. Due to the ongoing threat and worsening PTSD symptoms, Plaintiff submitted multiple written request to Bozzuto's legal team via email, requesting to be reasonably accommodated through a unit transfer. She also emailed a copy of her PTSD diagnosis in Nov. 2024. Bozzuto denied the request to move to a different unit and terminated her lease. Plaintiff and her children were forced to vacate on Dec 7, 2024, where they remained, and entered a homeless shelter, where they remained for 5 months. Plaintiff was actively receiving trauma-focused mental health treatment during August 2024 - present. In Feb 2025, after receiving NO response to prior emails, Plaintiff went to Bozzuto's corporate office to request a copy of her move out statement. ~~the~~ The following day on Feb 4, 2025, Bozzuto's attorney James Bradgon Esq., notified Plaintiff via email that she was "legally banned" from Bozzuto properties, and request to provide a copy of this "legal ban" at Plaintiff request.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. For any request for injunctive relief, explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Plaintiff seeks \$10 million in compensatory and punitive damages for the emotional distress, trauma, displacement, and civil rights violations caused by Bozuto's discriminatory, retaliatory and negligent conduct. Plaintiff and her children were forced into a homeless shelter, and her mental health was severely impacted during active mental health treatment. Plaintiff also requests injunctive relief to prevent Bozuto from continuing to harm tenants through misuse of bans, failure to accommodate disabilities, and misrepresentation to state agencies.

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Plaintiff emailed multiple follow-ups request for a copy of the alleged "legal ban", which Bozzuto never produced. When Plaintiff filed a housing discrimination complaint with HUD and MCCR - Maryland Commission on Civil Rights, Bozzuto told the state agency that the ban was only "informal".

In April 2025, Mr. Barbaur was incarcerated for domestic violence. He has since made recorded threats against Plaintiff from the Anne Arundel County jail, after she witnessed ~~another~~ a violence ~~on~~ attack by Ricardo Barbaur on Kayla Collins - a previous Bozzuto tenant. ~~who~~ Plaintiff once lived in the same building with as Ricardo frequently came to visit despite Bozzuto alleged ban on Ricardo Barbaur.

Bozzuto's failure to enforce it's own alleged legal Ban allowed Mr. Barbaur ~~to~~ continued access to the Azure property, exposing Plaintiff to further trauma and fear. Bozzuto's actions - includes denial of written accommodation request, ~~and~~ eviction, police involvement, misrepresentation of a legal ban, failure to Plaintiff right to due process, and failure to protect - caused Plaintiff and her children emotional harm, displacement, and worsening her disability.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: July 2ND, 2025

Signature of Plaintiff

Printed Name of Plaintiff


SHERALL RANDALL

(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

Email Address _____